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 RODNEY NEWMAN  
 JOHN DAVID BIGGERS  
 NCV SOFTWARE

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

BRADFORD TECHNOLOGIES, INC.,	)	Case No. 3:11-CV-04621 (EDL)
	)	
Plaintiff,	)	<b>STIPULATION AND ORDER TO STAY</b>
v.	)	<b>LITIGATION FOR ADDITIONAL 90</b>
	)	<b>DAYS AS MODIFIED</b>
NCV SOFTWARE.com, et al.,	)	
	)	
Defendants.	)	
	)	

1 WHEREAS, Plaintiff Bradford Technologies, Inc. ("Plaintiff") and Defendants Metro  
2 National Financial, LLC ("Metro Financial"), Karma Technologies, LLC ("Karma"), Rodney  
3 Newman ("Newman"), John David Biggers ("Biggers") and NCV Software (collectively,  
4 "Defendants") (representing all defendants who have been served in this matter), have agreed to  
5 participate in private mediation of this matter before a neutral;

6  
7 WHEREAS, the parties have tentatively scheduled a mediation with the Hon. Jamie  
8 Jacobs-May with Judicial Arbitration and Mediation Services on June 15, 2012;

9 WHEREAS, the parties wish to avoid the burden and expense of the litigation pending  
10 the outcome of their private mediation;

11 IT IS HEREBY STIPULATED and AGREED by and between the foregoing parties in  
12 this matter, through their respective counsel of record, as follows:

13  
14 1. This action should be stayed until July 15, 2012, to permit the parties to retain  
15 experts to review and compare the source code, software platform and other information relative  
16 or germane to the issues raised in this case and to participate in private mediation before a  
17 neutral.

18 2. If the stay is entered, then the scheduled April 24, 2012 hearing before the court  
19 shall be vacated. The motions to dismiss filed by Defendants Metro Financial, Newman and  
20 Karma, as well as the case management conference before the Court, shall be continued to a date  
21 to be set at a later time (but not during the pendency of the stay).

22  
23 3. The parties have agreed upon an appropriate form of protective order, which shall  
24 be submitted to the court.

25 4. Any party may request an order from the Court to modify or lift this stay upon  
26 good cause after consultation with counsel for the other parties to this action.  
27  
28

1                   **IT IS SO STIPULATED.**

2  
3           Dated: April 16, 2012

**THE HERITAGE LAW GROUP**

4  
5                                   /s/ ROGER D. WINTLE

6                   Roger D. Wintle  
7                   Attorney for Plaintiff: Bradford Technologies, Inc

8           Dated: April 16, 2012

**ANDERSON & KARRENBURG, P.C.**

9  
10                                   By: /s/ Heather M. Sneddon

11  
12                                   - and -

13                   GREENBERG TRAURIG, LLP  
14                   Kurt A. Kappes  
15                   Matthew L. Reagan

16                   Attorneys for Defendants  
17                   METRO NATIONAL FINANCIAL, LLC  
18                   KARMA TECHNOLOGIES, LLC  
19                   RODNEY NEWMAN  
20                   JOHN DAVID BIGGERS  
21                   NCV SOFTWARE

22                   **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

23           The Initial Case Management Conference is continued to July 17, 2012 at 10:00 a.m. Updated Case Management  
24           Conference Statements are due by July 10, 2012.

25           Dated: April 19, 2012

